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Attorneys for Plaintiff
LOLITA MORADA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LOLITA MORADA,

Plaintiff,

vs.

KAISER FOUNDATION HEALTH PLAN,
INC., a California Corporation; THE
VANGUARD GROUP, INC.,; and DOES 1 to
100, Inclusive,

Defendants.

Case No. 3:13-cv-05942-JCS

**JOINT STIPULATION TO EXTEND
TIME TO RESPOND TO COMPLAINT**

WHEREAS, Plaintiff originally filed the Complaint in this action in California Superior Court, County of San Francisco, on September 24, 2013, and served Defendants with the Complaint and Summons on November 25, 2013;

WHEREAS, Defendants removed the action from Superior Court on December 23, 2013, and, under Federal Rule of Civil Procedure 81(c), now have until December 30, 2013, to respond to the Complaint;

WHEREAS, the parties believe they have a basis on which to reach a settlement of this matter in its entirety and, to facilitate such discussions, wish to extend the time for Defendants Kaiser Foundation Health Plan, Inc. ("Kaiser") and The Vanguard Group, Inc. ("Vanguard") to respond to the Complaint.

NOW, THEREFORE, under Local Rule 6-1(a), Plaintiff Lolita Morada hereby stipulates and agrees that the deadline for Defendants to answer or otherwise respond to the Complaint shall be and hereby is extended 60 days, until **February 28, 2014**. This change does not alter any event or deadline already fixed by Court order.

IT IS SO STIPULATED.

DATED: December 27, 2013

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By: /s/Charles M. Dyke
Charles M. Dyke
Attorneys for Defendant
KAISER FOUNDATION HEALTH PLAN, INC.

DATED: December 27, 2013

MORGAN, LEWIS & BOCKIUS LLP

By: /s/Roberta H. Vespremi
Roberta H. Vespremi
Attorneys for Defendant
THE VANGUARD GROUP, INC.

DATED: December 27, 2013

LAW OFFICES OF RODEL E. RODIS

By: /s/Rodel E. Rodis
Rodel E. Rodis
Attorney for Plaintiff
LOLITA MORADA

1 I attest that my firm has obtained Mr. Rodis' and Ms. Vespremi's concurrence in the filing
2 of this document.

3 DATED: December 27, 2013

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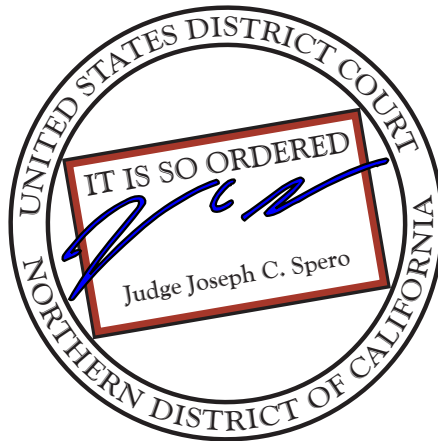
By: /s/ Charles M. Dyke

Charles M. Dyke

Attorneys for Defendant

KAISER FOUNDATION HEALTH PLAN, INC.

9 Dated: 1/6/14



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